

# Self-Audit Checklist (VSQGs)

This audit checklist will help you evaluate your facility's compliance with hazardous waste very small quantity generator (VSQG) requirements. Its use is strictly voluntary and you are not required to submit the results of your audit to the Wisconsin Department of Natural Resources (DNR).

Hazardous waste is a specific set of wastes, defined by the U.S. Environmental Protection Agency (EPA) and the DNR as hazardous because their chemical properties and toxicity can harm human health and the environment. For more on which wastes are hazardous, see [dnr.wi.gov](http://dnr.wi.gov) search "hazardous waste" or ch. NR 661, Wis. Adm. Code.

Hazardous waste generators have certain requirements to follow while waste accumulates on-site, and when the waste is treated on-site or shipped off-site to a hazardous waste facility.

The requirements that apply to your facility depend on the type and quantity of waste generated and your classification as a very small, small or large quantity generator of hazardous waste (VSQG, SQG or LQG, respectively). See the box for more details. The generator requirements are in ch. NR 662, Wis. Adm. Code.

## Completing this audit

The beginning of each section of this audit checklist includes an action list and a general description of each specific VSQG requirement. Each of the questions is a code requirement; the code citation for the requirement is given after the question.

You may use one audit checklist for the entire facility or one for each department generating hazardous waste. Remember to determine generator status by calculating the **total** amount of waste generated at the facility.

The first step in completing an audit is to determine the quantity of hazardous waste generated at your facility. Remember that the generation rate is determined by adding the quantities of **all** hazardous wastes generated in **all** departments at the facility in any given month.

## What type of generator are you?

Note: The totals below are for any calendar month.

**Large quantity generators (LQGs)** generate any of the following amounts of hazardous waste:

- more than 2,205 lbs. of hazardous waste;
- more than 2.2 lbs. of acute hazardous waste; or
- more than 220 lbs. of residue from cleaning up a spill of acute hazardous waste.

**Small quantity generators (SQGs)** generate:

- between 220 and 2,205 lbs. of hazardous waste;
- less than 2.2 lbs. of acute hazardous waste; and
- less than 220 lbs. of residue from cleaning up a spill of acute hazardous waste.

**Very small quantity generators (VSQGs)** generate:

- less than 220 lbs. of hazardous waste;
- less than 2.2 lbs. of acute hazardous waste; and
- less than 220 lbs. of residue from cleaning up a spill of acute hazardous waste.

Chemotherapy wastes, radiological wastes and infectious waste that are also hazardous wastes should be counted when determining generator status, along with hazardous waste generated by cleaning up spills. A worksheet for calculating the total amount of hazardous waste generated at your facility is attached to this audit checklist.

Once you have determined your facility is a VSQG of hazardous waste, proceed with this audit checklist. If your facility is not a VSQG, complete the SQG or LQG audit checklist, whichever is appropriate. The SQG checklist is available at <https://dnr.wi.gov/files/pdf/pubs/wa/wa1264.pdf>. The LQG checklist is available at <https://dnr.wi.gov/files/pdf/pubs/wa/wa1263.pdf>.

Questions with a "NO" answer indicate a discrepancy with Wisconsin's hazardous waste rules, and you will need to take follow-up actions to correct the discrepancy.



Bureau of Waste and Materials Management  
Wisconsin Department of Natural Resources  
PO Box 7921, Madison, WI 53707-7921  
[DNRWasteMaterials@wisconsin.gov](mailto:DNRWasteMaterials@wisconsin.gov)

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# Self-Audit Checklist for Health Care Facilities Very Small Quantity Generators

<b>Section A: Inspection Information</b>	
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Name of Health Care Facility	
Street Address	City
Date of Audit	Name of Auditors
Personnel Interviewed During Audit	Title and Department

<b>Section B: Waste Information</b>
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The generator of solid waste must determine if the solid waste is a hazardous waste by applying knowledge of the waste or conducting a waste analysis. Generator knowledge can be based on sources such as Material Safety Data Sheets (MSDS) or other reliable information, such as analysis from other generators in health care that use the same product and the same process.

Remember that the information supplied on the MSDS is representative of the product; properties of the waste material may be different. Waste samples must be analyzed by a state of Wisconsin-certified laboratory. The Wisconsin lab certification number is usually printed on the laboratory data sheets. Certification status can also be determined by contacting the lab directly or by reviewing the DNR list of certified labs at <https://dnr.wi.gov/regulations/labcert/lablists.html>

- Use the attached worksheet to record the quantities of each type of hazardous waste generated per month and those waste types that require further evaluation.
- Evaluate if the waste determinations are representative of the waste currently generated. Make a new waste determination when changes in materials or processes affect the properties of waste generated.
- Make a waste determination on waste types that have not been evaluated.
- Include in your evaluation materials contaminated through use, such as empty vials, syringes, spill clean up materials, etc.
- Refer to ch. NR 661, Wis. Adm. Code, at <https://www.legis.state.wi.us/rsb/code/nr/nr661.pdf> to determine if the waste is a characteristic or listed hazardous waste. Assign the appropriate waste codes (D, F, P or U) to each hazardous waste generated.
- Use the attached worksheet to calculate the total quantity of hazardous waste generated at your facility during the month. If the quantities of hazardous wastes vary from month to month, use the largest amounts generated to calculate generator status.

1. Has a hazardous waste determination been made on each solid waste generated? (NR 662.220(5)(a) / NR 662.220(6)(a))	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Has the waste determination been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used? (NR 662.220(5)(a) / NR 662.220(6)(a))	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Are all waste analyses done by state of Wisconsin-certified laboratories? (NR 662.220(5)(a) / NR 662.220(6)(a))	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>Section C: Off-site Management of Wastes and Manifest Requirements</b> Unless treated on-site, the hazardous waste must be shipped to an approved or exempt hazardous waste treatment, storage or disposal facility. VSQGs are not required to use hazardous waste manifests (a specific shipping document used for hazardous waste); additional requirements apply if manifests are used. <input checked="" type="checkbox"/> Verify that waste is sent to approved or exempt hazardous waste facilities. <input checked="" type="checkbox"/> Verify manifest requirements are followed if manifests are used for hazardous waste shipments.	
1. Is hazardous waste shipped to an approved or exempt hazardous waste treatment, storage or disposal facility? (NR 662.220(5)(e) / NR 662.220(6)(e))	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Does the generator use a hazardous waste manifest to ship hazardous waste? If No, go to Section D.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Has the generator obtained an EPA ID number? (NR 662.012) <b>Note:</b> Obtain an EPA ID number by submitting EPA form 8700-12 available at: <a href="https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and-disposal">https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and-disposal</a> . You must also submit notification when there is an ownership or name change.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Does the generator comply with the following manifest requirements? (NR 662.220(5)(f)2 / NR 662.220(6)(f)2) <input type="checkbox"/> The manifest is used according to the instructions in the appendix to 40 CFR part 262. <input type="checkbox"/> A facility that is permitted or licensed to accept the waste is designated on the manifest. <input type="checkbox"/> For out-of-state shipments, the generator sends a copy of the manifest to DNR within 30 days of receiving the signed copy from the designated facility.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. If the generator does not receive a signed copy of the manifest from the designated facility within 60 days of shipment, does the generator submit a legible copy of the manifest to the DNR that indicates there is no confirmation of delivery? (NR 662.220(5)(f)3 / NR 662.220(6)(f)3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
6. Is a copy of the manifest signed by the generator retained until the signed copy from the treatment, storage or disposal facility is received? (NR 662.220(5)(f)4 / NR 662.220(6)(f)4)	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. Is a copy of each manifest kept for at least three years from the date of shipment? (NR 662.220(5)(f)4 / NR 662.220(6)(f)4)	<input type="checkbox"/> Yes <input type="checkbox"/> No

### Section D: On-Site Storage of Waste in Containers

Containers can vary in size, holding just a few cc's to hundreds of gallons. While on-site, containers must meet certain standards, such as being closed unless waste is added or removed, properly labeled and in good condition. Funnels left in containers should have lids that are closed except when waste is added or removed. Incompatible wastes should be kept separated from each other. In order for a container to be considered "empty," it must meet certain criteria, depending on if it contained a material classified as an acute or non-acute hazardous waste. Containers that meet the definition of "empty" are not subject to hazardous waste requirements.

Although there is no limit on how long a VSQG can store hazardous waste on-site, it becomes an SQG when more than 2,205 lbs. of non-acute hazardous waste is accumulated on-site or an LQG if more than 2.2 lbs. of acute hazardous waste or 220 lbs. of acute hazardous waste residue is accumulated on-site.

- Verify all containers used to store hazardous waste on-site meet standards.
- Verify all empty containers meet the definition of "empty".
- Verify the VSQG accumulation limits are not exceeded.

<p>1. Do waste containers meet the following standards? (NR 662.220(5)(c)1 / NR 662.220(6)(c)1)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The contents of a container that is leaking or in poor condition are transferred to another container in good condition.</li> <li><input type="checkbox"/> Containers are made or lined with materials compatible with the waste.</li> <li><input type="checkbox"/> Containers are kept closed except when it is necessary to add or remove waste.</li> <li><input type="checkbox"/> Incompatible wastes are stored in separate containers unless the mixing of incompatible wastes will not generate extreme heat, fire, explosion, toxic gases or other dangers.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Are all containers clearly marked with the words "Hazardous Waste"? (NR 662.220(5)(c)2)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>3. Do "empty" containers that held non-acute hazardous waste meet all of the following standards? (NR 661.07(2)(a))</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> All wastes have been removed by normal means for the type of container (pouring, pumping, aspirating, etc.).</li> <li><input type="checkbox"/> 3 percent or less of the total volume of the container remains, or no more than an inch of residue remains.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>4. Is the pressure in "empty" containers of compressed gas (pressurized inhalers, aerosol cans, gas cylinders) at or near atmospheric pressure? (NR 661.07(2)(b))</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>5. Do "empty" containers that held acute hazardous waste meet one of the following standards? (NR 661.07(2)(c))</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The container has been triple rinsed.</li> <li><input type="checkbox"/> The container has been cleaned by another method as effective as triple rinsing.</li> <li><input type="checkbox"/> The container's inner liner has been removed and disposed as hazardous waste.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>6. Is the rinsate from cleaning a container of acute hazardous waste disposed as hazardous waste? (NR 661.07(1)(b))</p> <p><b>Note:</b> The rinsate may be usable as a product (e.g., pesticide application).</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>7. Does the generator accumulate less than the following quantities of hazardous waste?</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> 2,205 lbs. (1,000 kg) of non-acute hazardous waste. (NR 662.220(6)(b))</li> <li><input type="checkbox"/> 2.2 lbs. (1 kg) of acute hazardous waste. (NR 662.220(5)(b))</li> <li><input type="checkbox"/> 220 lbs. of residue from the cleanup of a spill of acute hazardous waste. (NR 662.220(5)(b))</li> </ul> <p><b>Note:</b> If these quantities are exceeded, the VSQG becomes a SQG or LQG.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

### Section E: On-Site Treatment

Treatment changes the physical, chemical or biological characteristics so as to render the waste non-hazardous, more amendable for recycling, reduced in volume or safer for transport. Some treatment activities, such as solvent distillation, elementary neutralization and silver recovery, may be performed on-site without a hazardous waste treatment license. Do not perform other treatment activities unless your facility has been issued a hazardous waste treatment license. Evaporating hazardous waste solvents is treatment subject to licensing. Treatment activities that are exempt from hazardous waste licensing requirements are stated in NR 670.001(3)(b).

Hazardous waste accumulated on-site before treatment and hazardous waste generated as a result of the treatment activity must be managed in compliance with applicable hazardous waste requirements. For example, waste solvent accumulated before it is distilled on-site should be managed in compliance with VSQG requirements (make a waste determination; recycle the solvent before VSQG accumulation quantities are exceeded; and use containers that are in good condition, labeled "hazardous waste" and kept closed except when adding or removing waste). The still bottoms generated by recycling the solvent should also be managed in compliance with VSQG requirements. VSQGs that recycle on-site must obtain an EPA ID number.

- Determine if the facility is conducting on-site treatment.
- If waste is recycled on-site, determine if the VSQG has an EPA ID number.
- Determine if wastes accumulated on-site before and after treatment are managed according to VSQG requirements.
- Discontinue treatment activities that require a hazardous waste treatment license.

1. If waste is recycled on-site, has the generator obtained an EPA ID number? (NR 661.06(2)) <b>Note:</b> Obtain an EPA ID number by submitting EPA form 8700-12 available at: <a href="https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and">https://www.epa.gov/hwgenerators/instructions-and-form-hazardous-waste-generators-transporters-and-treatment-storage-and</a> . A subsequent notification should be submitted when there is an ownership or name change.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2. If hazardous waste is recycled on-site, does the generator comply with all of the applicable VSQG requirements while hazardous waste is accumulated on-site before and after the recycling activity? (NR 661.06(2))	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3. If hazardous waste is neutralized in a tank or container, is the waste hazardous for the corrosivity characteristic only? (NR 665.0001(3)(j)) <b>Note:</b> If the waste is hazardous for more than the corrosivity characteristic, the treatment is not exempt from licensing.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4. If the facility is operating a silver recovery unit (e.g., x-ray or photography), is the silver sent off-site for further reclamation? <b>Note:</b> Per NR 666.070(3), persons who store recycled materials must keep records to document they are not accumulating the materials speculatively (i.e., at least 75 percent of the material is legitimately recycled each calendar year).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5. If hazardous waste is treated in containers, does the generator comply with the container standards in Section D during the treatment activity? (NR 665.0001(3)(g))	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
6. If absorbent material is combined with hazardous waste to eliminate free liquids, are all of the following requirements met? (NR 665.0001(3)(m)) <input type="checkbox"/> The absorbent material is added when the hazardous waste is first placed in the container. <input type="checkbox"/> The contents of a container that is leaking or in poor condition are transferred to a container in good condition. <input type="checkbox"/> When mixing incompatible wastes, precautions are taken to prevent reactions that generate extreme heat, fire, explosion, toxic gases or other dangers. <input type="checkbox"/> The container is made of materials that are compatible with the waste.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
7. If other hazardous waste treatment activities occur on-site, is the treatment exempt from hazardous waste licensing requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

For more information on waste in health care, see <https://dnr.wi.gov/topic/HealthWaste/Business.html>.

## Worksheet for Calculating Total Quantity of Hazardous Waste Generated

For the whole facility:  Yes  No

Only for Department (name): \_\_\_\_\_

Description of waste generated (e.g., waste acetone, coumadin, etc.)	Hazardous waste code	Generation rate (lbs./month)	Facility to which waste is shipped	Analysis available (✓)	Generator knowledge (✓)
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
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				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
Maximum quantity of waste generated per month <sup>1</sup> :		<div style="text-align: right; margin-right: 20px;">                     _____ lb/mo                      _____ lb/mo                 </div>			
Non-acute waste: Acute waste:					

<sup>1</sup>If this is the quantity of hazardous waste generated in one department, use a separate worksheet to calculate the total amount generated at the facility.